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for the Substantively Consolidated SIPA Liquidation

of Bernard L. Madoff Investment Securities LLC

and the Chapter 7 Estate of Bernard L. Madoff

Hearing Date: January 31, 2018 at 10:00 a.m.

Objection Deadline: January 24, 2018

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

THE ESTATE OF STEVEN MENDELOW;
NANCY MENDELOW, individually and in her
capacity as Executrix of THE ESTATE OF
STEVEN MENDELOW; CARA MENDELOW;
PAMELA CHRISTIAN; C&P ASSOCIATES,
LTD.; and C&P ASSOCIATES, INC.,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04283 (SMB)

**NOTICE OF MOTION FOR ENTRY OF ORDER PURSUANT TO SECTION 105(a) OF
THE BANKRUPTCY CODE AND RULES 2002 AND 9019 OF THE FEDERAL RULES
OF BANKRUPTCY PROCEDURE APPROVING A SETTLEMENT AGREEMENT BY
AND BETWEEN THE TRUSTEE AND THE ESTATE OF STEVEN MENDELOW
AND OTHER DEFENDANTS IN ADVERSARY PROCEEDING NO. 10-04283**

PLEASE TAKE NOTICE that Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III (“SIPA”) and the substantively consolidated Chapter 7 estate of Bernard L. Madoff, individually, by and through his undersigned counsel, will move as set forth in the annexed motion (the “Motion”) before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, on January 31, 2018, at 10:00 a.m., or as soon thereafter as counsel may be heard, seeking entry of an order, pursuant to section 105(a) of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.*, and Rules 2002 and 9019 of the Federal Rules of Bankruptcy Procedure, approving a certain settlement agreement by and between the Trustee on the one hand and Defendants on the other hand.

PLEASE TAKE FURTHER NOTICE that written objections to the Motion must be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than 5:00 p.m. on January 24, 2018 (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Jonathan B. New and Robertson D. Beckerlegge; (b) the Securities Investor Protection Corporation, 1667 K Street, NW, Suite 1000, Washington, DC 20006-1620, Attn: Kevin Bell; and (c) Clayman & Rosenberg LLP, counsel for Defendants, 305 Madison Avenue, Suite 1301,

New York, New York 10165, Attn: Seth L. Rosenberg. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

PLEASE TAKE FURTHER NOTICE that failure to file timely objections may result in the entry of an order granting the relief requested in the Motion without further notice to any party or an opportunity to be heard.

Date: January 5, 2018
New York, New York

By: s/ Jonathan B. New
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Substantively Consolidated SIPA Liquidation
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LLC and the Chapter 7 Estate of Bernard L.
Madoff*